

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAENEAN LIGON, et al. : **NOTICE OF PLAINTIFFS'**
: **MOTION FOR CLASS**
: **CERTIFICATION**
Plaintiffs, :
: :
-versus- : 12 Civ. 2274 (SAS)(HBP)
CITY OF NEW YORK, et al. :
: :
Defendants. :
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PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the accompanying Declarations of Christopher Dunn and J. McGregor Smyth, Jr., and evidence adduced at the preliminary injunction hearing held in this matter beginning on October 15, 2012, the plaintiffs will move before The Honorable Shira A. Scheindlin, United States District Judge for the Southern District of New York, for an order certifying the following class pursuant to Federal Rule of Civil Procedure 23(b)(2):

All individuals who have been or are at risk of being stopped outdoors without legal justification by NYPD officers on suspicion of trespassing in Bronx apartment buildings enrolled in the NYPD's Trespass Affidavit Program (commonly referred to as "Operation Clean Halls").

Respectfully submitted,

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Dated: November 9, 2012
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